

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MINNESOTA**

In re:

Curtis C. Nelson,  
Debtor.

Case No.:11-43113

Chapter 11 Case

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**DEBTOR'S RESPONSE TO  
MOTION TO CONVERT OR DISMISS**

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Curtis C. Nelson (the "Debtor") submits this response to the motion to dismiss this case or convert it to a Chapter 7 case filed by the United State Trustee.

1. Since filing this chapter 11 case, the Debtor has been unable to sell the real estate that is his most valuable asset for an amount sufficient to pay substantial indebtedness in excess of the senior mortgage debt. His prospects for reorganization had, in large part, depended on such a sale. In addition, the Debtor's continued health problems make it impossible for him to project income that would fund a plan with any degree of certainty.

2. As a result of the foregoing, the Debtor no longer believes that this case should proceed under chapter 11 and wishes to give notice that he has no objection to conversion to chapter 7.

Dated: September 27, 2011

HINSHAW & CULBERTSON LLP

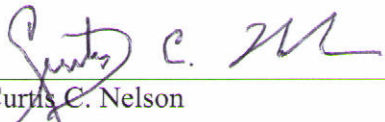
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ATTORNEYS FOR DEBTOR

### VERIFICATION

I, Curtis C. Nelson, the Debtor, hereby certify under penalty of perjury, that the statements contained in the foregoing Response to Motion to Dismiss or Convert are true and correct to the best of my knowledge, information, and belief.

Dated: September 27, 2011

  
Curtis C. Nelson

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MINNESOTA

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**PROOF OF SERVICE**

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Linda M. Swanson, an employee of Hinshaw & Culbertson LLP, and in the course of said employment on September 27, 2011 caused the following documents:

1. Debtor's Response to Motion to Convert or Dismiss;  
to be filed electronically with the Clerk of Court through ECF, and states that a copy of the above-referenced documents was delivered to the people listed below who are Filing Users, by automatic e-mail notification pursuant to the Electronic Case Filing System and this notice constitutes service or notice pursuant to Local Rule 9006-1(a).

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Dated: September 27, 2011

/s/ Linda M. Swanson  
Linda M. Swanson